



LAW OFFICE OF
YURIY MOSHES, P.C.

322 West 48th Street, 6th FL
New York, NY 10036

Please reply to our BROOKLYN office
111 Northfield Ave, Suite 208A
West Orange, NJ 07052

517 Brighton Beach Ave., 2nd Floor
Brooklyn, NY 11235

Tel. (888) 445-0234 Fax: (646) 843-7570

Yuriy Moshes, Esq.

Member of NJ and NY Bar.

Gennady Litvin, Esq.

Jessenia Maldonado, Esq.

Members of NY Bar.

December 18, 2020

Via ECF

Hon. Laura Taylor Swain
United States District Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

MEMO ENDORSED

Re: *Washington v. NYC Madison Avenue Medical P.C. et al*
20-cv-03446 (LTS)(SN)

Your Honor:

We represent Plaintiff Stacy Washington in the above-captioned matter. We write now, with the consent of Defendants' counsel, to propose a briefing schedule for Defendants' motion to dismiss. (Doc. No.: 24).

The Parties have agreed to the following briefing schedule:

- Plaintiff's opposition to be filed on January 7, 2021; and
- Defendants' reply to be filed on January 21, 2021.

The Parties also request that the mediation currently scheduled for January 12, 2021, be adjourned until resolution of Defendants' motion. The reason for this request is that Defendants' motion attempts to resolve the issue of liability by each Defendant. Specifically, Defendants move to dismiss four (4) out of six (6) Defendants sued in the instant action. The Parties believe that this issue must first be resolved before a settlement can be reached.

We thank the Court for its time and consideration of this request.

Respectfully submitted,

LAW OFFICE OF YURIY MOSHES, P.C.

/s/
Jessenia Maldonado, Esq.

cc: Nicole Allocca, Esq. (*Via ECF*)
Paul D. Werner (*Via ECF*)

The requests for approval of the above briefing schedule and for adjournment of mediation pending resolution of the motion are granted. DE# 16 resolved.

SO ORDERED.

/s/ Laura Taylor Swain, USDJ 12/21/2020